

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION

JENS H.S. NYGAARD,	§	
	§	
Plaintiff,	§	Case No. 6:20-cv-00234-ADA
v.	§	
FÉDÉRATION INTERNATIONALE DE	§	
L'AUTOMOBILE, FORMULA ONE	§	
MANAGEMENT LTD., FORMULA ONE	§	
WORLD CHAMPIONSHIP LTD.,	§	
MERCEDES-BENZ GRAND PRIX LTD.,	§	
DAIMLER AG, LEWIS HAMILTON, RED	§	
BULL TECHNOLOGY LTD., RED BULL	§	
RACING LTD., FERRARI S.P.A.,	§	
CHARLES LECLERC, and DALLARA	§	
AUTOMOBILI S.P.A.,	§	
	§	
Defendants.	§	
	§	

**DEFENDANTS' SUPPLEMENTAL REPORT REGARDING
NARROWING OF PRIOR ART**

Pursuant to the Court's Order Governing Proceedings (Dkt. No. 110) and in accordance with the parties' Joint Report Regarding Narrowing of Asserted Claims and Prior Art (Dkt. No. 286), the Defendants respectfully submit the following supplemental report.

Defendants elect to pursue the following thirteen grounds:

1. De Ruffi
2. De Ruffi and Daimler '122
3. De Ruffi and Nygaard '906
4. Nygaard '906 and De Ruffi
5. Nygaard '906 and What Car
6. Nygaard '906 and Haslegrave
7. Basile

8. Basile and the knowledge of a POSITA
9. Basile and De Ruffi
10. Basile and Haslegrave
11. Henricks and the knowledge of a POSITA
12. Henricks and De Ruffi
13. Henricks and Haslegrave

Dated: March 25, 2022

Respectfully submitted,

/s/Jeffrey Johnson
Claudia Wilson Frost
State Bar No. 21671300
Jeffrey L. Johnson
State Bar No. 24029638
Ryan C. Wooten
State Bar No. 24075308
ORRICK, HERRINGTON & SUTCLIFFE LLP
609 Main, 40th Floor
Houston, TX 77002
Telephone: 713.658.6400
Facsimile: 713.658.6401
cfrost@orrick.com
jj@orrick.com
rwooten@orrick.com

Travis Jensen
CA Bar No. 259925
ORRICK, HERRINGTON & SUTCLIFFE LLP.
1000 Marsh Rd.
Menlo Park, CA 94025
Telephone: 650.614.7400
Facsimile: 650.614.7401
tjensen@orrick.com

**ATTORNEYS FOR DEFENDANT
FÉDÉRATION INTERNATIONALE DE
L'AUTOMOBILE**

/s/ Harrison Rich

Douglas M. Kubehl
State Bar Number 00796909
doug.kubehl@bakerbotts.com
Harrison Rich *pro hac vice*
State Bar Number 24083730
harrison.rich@bakerbotts.com
BAKER BOTT S L.L.P.
2001 Ross Avenue, Suite 900
Dallas, TX 75201
Telephone: (214) 953-6816
Facsimile: (214) 661-4816

**ATTORNEYS FOR DEFENDANTS
FORMULA ONE MANAGEMENT
LIMITED AND FORMULA ONE WORLD
CHAMPIONSHIP LIMITED**

/s/ Mark Chapman
Deron R. Dacus
State Bar No. 00790553
THE DACUS FIRM, P.C.
821 ESE Loop 323, Suite 430
Tyler, TX 75701
Phone: (903) 705-1117
Fax: (903) 581-2543
ddacus@dacusfirm.com

Edgar H. Haug (*pro hac vice*)
Mark A. Chapman (*pro hac vice*)
Roman Khasidov (*pro hac vice*)
HAUG PARTNERS LLP
745 Fifth Avenue, 10th Floor
New York, New York 10151
Telephone: (212) 588-0800
Facsimile: (212) 588-0500

**ATTORNEYS FOR RED BULL RACING
LTD. AND RED BULL TECHNOLOGY
LTD.**

CERTIFICATE OF SERVICE

The undersigned certifies that on March 25, 2022, all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document through the Court's CM/ECF system.

/s/ David Medina
David Medina